

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 24-cr-131 (JRT/LIB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**DEFENDANT'S MOTION FOR
RELEASE OF MEDICAL RECORDS**

WARREN HOLT, JR.

Defendant.

Defendant WARREN HOLT, JR., hereby moves the Court for an order authorizing the release of medical records held in the Minnesota State criminal cases upon which the present matter is predicated, pursuant to Rule 12 of the Federal Rules of Criminal Procedure.

Defendant has provided notice of intent to present a defense of insanity pursuant to 18 U.S.C. § 17. The facts underlying the basis of the present criminal charges were separately prosecuted under Minnesota State District Court case 69DU-CR-21-1782, St. Louis County. In both that matter and another MN State case, 69DU-CR-22-472, St. Louis County, Defendant underwent a mental illness test pursuant to Minnesota Rules of Criminal Procedure 20.02, related to mental deficiency occurring at the time of the alleged crime. In both matters, and by separate experts, Defendant was determined to have been operating under mental health deficiency at the time.

Accordingly, because such evidence would have a bearing upon Defendant's affirmative defense pursuant to 18 U.S.C. § 17, and the Government's burden of proof in this matter, Defendant respectfully makes a motion to this Court to order the release of all medical records

and confidential court filings in the St. Louis County, State of Minnesota, criminal cases to the parties in this matter.

This motion is based on the Indictment, all records and files in this matter, and any testimony at the hearing of this motion.

Date: June 7, 2024

Respectfully Submitted,

/s/ Melvin R. Welch

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